REMARKS

Claims 20, 26 through 32, and 37 through 48 are pending in this application. Claims 20, 28, and 37 are in independent form. Currently no claims stand allowed. The Office action dated Feburary 17, 2004 rejects the pending claims under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,476,833 to Moshfeghi (*Moshfeghi*).

As should be clear from applicants' specification, applicants' invention provides solutions to problems relating to software engineering. Claim 20 is a "computer software application development system." Claim 28 is a "method for enhancing security in a computer software application development environment," and claim 37 is a computer-readable medium having computer-executable instructions for carrying out such a method.

By contrast, *Moshfeghi* is concerned not with the production of software by different kinds of programmers, developers or designers, but with the use of fully-developed software products to access network resources by different classes of end users. More specifically, *Moshfeghi* discloses methods and apparatus for browsing markup language documents from within a non-browser client application program running on an end-user computing device, in such a way that users may be restricted to certain browser interface functions and to certain permitted network resources.

*Claim 20*

As applicants explained in their CPA Preliminary Amendment, filed on November 26, 2003, claim 20 describes a system in which the external resource files facilitate a division of labor in software development. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP § 2131 (quoting *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d

628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). The elements recited in applicants' claim 20 are not expressly or inherently described in *Moshfeghi.*

The software application development system of claim 20 includes "a first group of system users responsible for writing computer software code." *Moshfeghi*, which does not concern the problems of software development, does not speak of writers of software code. The Office action cites column 3, lines 8-12 of *Moshfeghi* in support of its contention that *Moshfeghi* discloses this element of claim 20. However, this passage merely states that

> this invention includes methods and apparatus for browsing markup language documents from within the context of an executing application. This is achieved by embedded browser functionality that can be activated to display an embedded browser sub-window inside the main application window.

The Office action also cites column 5, lines 51-65. Here, however, *Moshfeghi* describes end-user computers running client application software that visually displays information available across public or private networks, and contemplates that this software is object-oriented in structure.

The system of claim 20 also recites "a second group of system users responsible for modifying one or more external resource files written in a markup language." While *Moshfeghi* describes browsing HTML and XML documents, it makes no reference to the concept of an external resource file or to a category of system user in the software development setting responsible for modifying external resource markup-language files. Here too the citations provided in the Office action do not provide support for the contention that *Moshfeghi* discloses this element. Column 3, lines 20-25 states:

> The administrator of the system in which an application according to this invention is installed can change the resource access and browsing function privileges of users by editing the content of their user profiles.

A network system administrator, charged with controlling user access to documents or other resources available through a network, bears no relation to the group of system users responsible

for modifying markup-language files for use in a software engineering setting. It should be noted that the user profiles of *Moshfeghi* are database records, not markup-language files (see *Moshfeghi*, col. 8, ll. 27-53).

As support for the view that *Moshfeghi* anticipates the second element of claim 20, the Office action also cites column 3, lines 50-55, and column 6, lines 26-32. These passages merely indicate that the disclosed client-server system includes a markup-language document browser and an HTTP document server. Applicants suspect that these passages are cited because they make use of the term "resource." It should be noted that "resource" is a term that has many different applications in the computing and networking fields. In applicants' specification, a "resource" is non-executable data that is logically deployed by an executing application, such as a string or an image file defining the appearance of a window in a graphical user interface. In the Internet protocol context, a "resource" refers to data accessible by way of networked transfer in accordance with the protocol, such as an HTML document.

The third element recited in claim 20 is "a graphical control locator for locating the one or more external resource files." The Office action cites column 4, lines 6-10 to support the contention that *Moshfeghi* discloses this feature. The cited passage states:

> In a first aspect of the first embodiment, this invention includes the apparatus of the
> first embodiment wherein the browser specific controls comprise a location entry
> field for entry of linking information representing resource addresses . . . .

The "location entry field" described in *Moshfeghi* is nothing more than a *graphical element* of an embedded web browser that, if displayed, shows, as a text string, the network address of the data being accessed by the browser. Such fields are a feature of all conventional web browsers. The graphical control locator of claim 20 is something entirely different, a *routine*. As explained in applicants' specification:

4

> The operating system, following a sequence of one or more calls, provides a locating routine, termed here as a Graphical Control Locator (GCL), for locating a resource file containing the desired information (step 132) although similar routines from sources other than the operating system could be used as well. The GCL uses a defined strategy reflecting a file naming scheme and a systematic search of possible paths to locate the requested resource (step 134), which is loaded by GCL (step 136).

Specification, p. 18, ll. 6-12.

### Claims 28 and 37

Claim 28 is a "method for enhancing security in a computer software application development environment," and claim 37 is its computer-readable medium counterpart. The elements of these claims are neither expressly nor inherently described in *Moshfeghi*. The first element recited in these claims is "creating one or more external resource files for storing data in a markup language for implementing resources." To support the view that *Moshfeghi* anticipates this element, the Office action cites the same passages in *Moshfeghi* that are cited in support of the view that *Moshfeghi* anticipates the second element of claim 20. The refutations provided above in connection with the second element of claim 20 are equally applicable to the first element of claims 28 and 37.

In support of its contention that *Moshfeghi* anticipates the second element of claims 28 and 37, "using a graphical control locator for retrieving information from the one or more resource files in response to a request for a resource," the Office action cites the same passage in *Moshfeghi* that is cited in support of the view that *Moshfeghi* anticipates the third element of claim 20. The refutations provided above in connection with the third element of claim 20 are equally applicable to the second element of claims 28 and 37.

The third and fourth elements recited in claims 28 and 37 are "providing a first user with authority to modify the one or more resource files and execute an application program associated with the one or more resource files" and "restricting the first user from accessing and modifying

5

source code for the application program." In support of the view that *Moshfeghi* anticipates

these elements, the Office action cites several passages in *Moshfeghi* that describe the central

feature of the *Moshfeghi* invention: an embedded browser that restricts certain users' access to

network resources and browser interface functions. However, *Moshfeghi* does not describe

restricting a user from accessing and modifying a program's source code files while permitting

the same user to modify another category of files, resource files, as well as to execute the
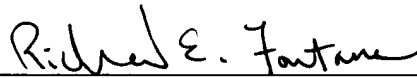
program.


For the foregoing reasons, as well as other reasons, *Moshfeghi* does not anticipate

applicants' claims. Applicants therefore respectfully request that the rejections of claims 20, 28

and 37 be withdrawn and that these independent claims be allowed. In addition, applicants

respectfully request that the rejections of claims 26, 27, 29-32, and 38-48 be withdrawn and that

these claims be allowed, as they include all the limitations of the patentable independent claims.

## CONCLUSION

The application is considered to be in good and proper form for allowance, and the examiner is respectfully requested to pass this application to issue.

If, in the opinion of the examiner, a telephone conference would expedite the prosecution of the subject application, the examiner is invited to call the undersigned attorney.

Respectfully submitted,

Richard E. Fontana, Reg. No. 52,902
One of the Attorneys for Applicants
LEYDIG, VOIT & MAYER, LTD.
Two Prudential Plaza, Suite 4900
180 North Stetson Avenue
Chicago, Illinois 60601-6780
(312) 616-5600 (telephone)
(312) 616-5700 (facsimile)

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